Response to Office Action mailed on December 2, 2003 Page 6

REMARKS

In the Office Action, claims 20-33 and 48-54 were withdrawn from consideration, claims 34, 37-41 and 44-47 were rejected, and 35, 36, 42 and 43 were objected to. The Examiner also formulated objections to the Abstract and Title. By the present Response, the Abstract is replaced, as is the Title. Also, claims 20-33, and claims 48-54 are canceled without prejudice. Upon entry of the amendments, claims 34-47 will remain pending in the present patent application. Reconsideration and allowance of all pending claims are requested.

Certain of the claims, including independent claims 34 and 41, were rejected in the Office Action under 35 U.S.C. §102(b) as anticipated by Linkous. The reference has been carefully considered, and is not believed to anticipate these claims or the claims that depend therefrom.

The Linkous reference describes an electric motor in which two coil groups are installed in a stator. The reference is exceedingly specific as to the nature of these coil groups and the manner in which they are interconnected. In particular, the reference specifically relates to a two pole motor. Throughout the reference, specific mention is made of two coil groups 10 and 11. Each coil group is made up of a series of coils, coil group 11 including coils 33, 34, 35, 36 and 37, while coil group 10 includes coils 38, 39, 40, 41 and 42. Moreover, the reference specifically shows what can only be understood to be leads exiting a single end of the stator core. These leads can be seen in Figures 1, 3, and 12, in which they are numbered 22 and 23 (Figures 1 and 3) and 82 and 84 (Figure 12). Clearly, these leads exit a single end of the stator core. In further embodiments described by Linkous, and not referred to by the Examiner, four coil groups are mentioned, including groups 51, 52, 53 and 54.

The Examiner is believed to have misinterpreted the Linkous reference in formulating the rejection. In particular, the pending claims recite multiple coil groups for different electrical phases. This is true of both claim 34 and claim 41. The stator described in Linkous is a single phase machine with only two leads.

Moreover, the reference specifically describes the coil groups, and is exceedingly clear that these are *only two* in number in one embodiment, and *only four* in number in a second embodiment. Both claims 34 and 41 recite six coil groups. The reader is *not* free to interpret the reference in a manner that is inconsistent with its own language.

Specifically, Linkous describes items 33-42 as *coils* and not as *groups*, and items 55, 56 and 57 similarly as *coils*, and not as *groups*. A coil group has a special meaning in the motor art, and Linkous describes two, namely groups 10 and 11, or four, namely groups 51-54.

Further, claim 41 recites that the leads from the various coil groups exit first and second ends of the stator core, depending upon the coil group recited in the claim. The Linkous reference, as noted above, describes a core in which leads for only two coil groups exit the same side of the stator core.

Finally, claims 34 and 41 relate to insertion of the coil groups through the respective ends of the core. Nothing in the reference, including the passage cited by the Examiner, describes insertion through both or alternative ends of the stator core.

In view of these deficiencies of the Linkous reference, it is clear that the reference cannot anticipate either claim 34 or claim 41, or the claims depending therefrom.

Accordingly, reconsideration and allowance of all pending claims are requested.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a

telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: 3/z/z

Patrick S. Yoder
Reg. No. 37,479
FLETCHER YODER
P.O. Box 692289
Houston, TX 77269-2289
(281) 970-4545

CORRESPONDENCE ADDRESS
ALLEN-BRADLEY COMPANY, LLC
Patent Department/704P Floor 8 T-29
1201 South Second Street
Milwaukee, Wisconsin 53204
Attention: Mr. Alexander Gerasimow

Phone: (414) 382-2000